

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 2 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
THOMAS C. WRIGHT, M.D. FOR WAVE 2**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Thomas C. Wright for Ethicon Wave 1, Dkt. 1986 (motion), 1988 (memorandum in support). Plaintiffs respectfully request that the Court exclude Thomas C. Wright's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 2 cases identified in Exhibit A attached hereto.

Dated: July 21, 2016

Respectfully submitted,

/s/ D. Renee Baggett

Bryan F. Aylstock, Esq.

Renee Baggett, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

tcartmell@wcllp.com

EXHIBIT A

Majors, Jennifer	2:12-cv-01523
Allen, Diana	2:12-cv-01676
Johnson, Cynthia	2:12-cv-01704
Swanson, Karen	2:12-cv-01709
Gibson, Susan	2:12-cv-01740
Chrysler, Marion	2:12-cv-02060
Minogue, Bridgette	2:12-cv-02112
Bihlmeyer, Donna	2:12-cv-02159
Martin, Patricia	2:12-cv-02185

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com